

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA

Roanoke Division

BRUCE A. ESTES,

Plaintiff,

v.

CIVIL ACTION NO. 7:15-cv-00154

HAROLD CLARKE, et al.,

Defendants.

AFFIDAVIT

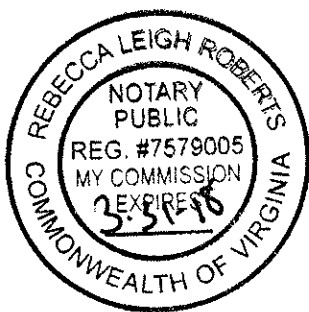
State of Virginia, County of Grayson, to-wit:

J. MORRISON, first being duly sworn, states as follows:

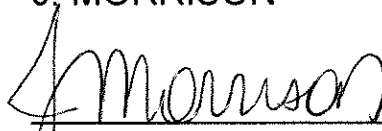
1. I am the Food Operations Manager at River North Correctional Center (RNCC).
2. The information in this affidavit is based on personal knowledge and records maintained in the regular and ordinary course of business.
3. I have been informed of this lawsuit filed by Offender Bruce Estes (#1185224) and his allegation that the Common Fare (CF) menu offered at RNCC is not Kosher. Estes complains that he is being forced to eat non-Kosher foods thereby hindering his ability to practice his faith.

4. RNCC offers the CF diet to offenders whose religious dietary needs cannot be met by the master menu. CF meals at RNCC are prepared in a designated room separate from the kitchen and are cooked in a designated cooking vessel. We also have a designated oven in our main kitchen which is used for CF meals only.


5. In April 2014, RNCC began offering a new CF menu under a pilot program. The new menu includes hot food items at most meals, with only a few cold meals each week. Prior to this, the majority of meals served on CF were cold, with only three hot meals offered each week. The new menu has been a success and it is my understanding that the Virginia Department of Corrections will be implementing this at all facilities authorized to serve CF. A sample copy of the CF menu being served at RNCC is attached as Enclosure A.



J. MORRISON


Affiant

Sworn and subscribed to before me, a Notary Public, in and for the State of Virginia, County of Grayson, this 29 day of June 2015.


Notary Public

My commission expires: 3-31-18

Virginia Department of Corrections
COMMON FARE MENU APRIL 2015 - MARCH 2016

WEEK 1

	SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
B R E A K F A S T	FRUIT COOKED OATMEAL COOKED EGG BREAD JELLY MARGARINE COFFEE MILK	1 SERV JUICE 1 C COOKED FARINA 2 EA PEANUT BUTTER 2 EA TOAST 1 OZ JELLY 2 TSP MARGARINE 8 OZ COFFEE 16 OZ MILK	4 OZ FRUIT 1 C COOKED OATMEAL 1/4 C PANCAKE 2 EA SYRUP 1 OZ BRK POTATOES 2 TSP MARGARINE 8 OZ COFFEE 16 OZ MILK	1 SERV JUICE 1 C COOKED FARINA 2 EA FRIED EGG 2 OZ TOAST 1/2 C JELLY 2 TSP MARGARINE 8 OZ COFFEE 16 OZ MILK	4 OZ FRUIT 1 C COOKED OATMEAL 2 EA FRENCH TOAST 2 EA SYRUP 1 OZ BRK POTATOES 2 TSP MARGARINE 8 OZ COFFEE 16 OZ MILK	1 SERV JUICE 1 C COOKED FARINA 2 EA COOKED EGG 2 OZ BREAD 1/2 C JELLY 2 TSP MARGARINE 8 OZ COFFEE 16 OZ MILK	4 OZ COOKED APPLES 1 C COOKED OATMEAL 2 EA SOY B-FAST PATTY 2 EA TOAST 1 OZ MARGARINE 2 TSP JELLY 8 OZ COFFEE 16 OZ MILK
L U N C H	VEG PATTY BOILED SWEET POT COOKED CABBAGE BREAD KETCHUP MARGARINE FRUIT BEVERAGE	1 EA EGG SALAD 1 C CUCUMBERS 1 C CARROT 2 EA BREAD 1 OZ RICE PUDDING 2 TSP MUSTARD 1 SERV BEVERAGE 8 OZ	2/3 C TUNA CAKE 1 C BEANS 1 C COOKED SQUASH 2 EA BREAD 1/2 C MARGARINE 1 OZ FRUIT 8 OZ BEVERAGE	1 EA PEANUT BUTTER 1 C JELLY 1 C CELERY 2 EA CARROTS 2 TSP BREAD 1 SERV FRUIT 8 OZ BEVERAGE	1/3 C BEANS 1 1/2 OZ COOKED GREENS 1 C BAKED SWEET POT 1 C BREAD 4 EA MARGARINE 1 SERV FRUIT 8 OZ BEVERAGE	1 1/2 C HARD BOILED EGGS 1 C NOODLES 1 EA COOKED CABBAGE 2 EA BREAD 2 TSP MAYONNAISE 1 SERV MARGARINE 8 OZ CAKE BEVERAGE	3 EA VEG PATTY 1 C BEANS 1 C STEWED TOMATOES 2 EA BREAD 1 OZ KETCHUP 2 TSP MARGARINE 1 SERV FRUIT 8 OZ BEVERAGE
D I N N E R	NOODLES TOMATO SAUCE HARD BOILED EGGS COOKED GREENS BREAD MARGARINE FRUIT BEVERAGE	1 C SOY RICE MIX 1/2 C COOKED EGG 3 EA COOKED CABBAGE 1 C BREAD 2 EA MARGARINE 2 TSP FRUIT 1 SERV BEVERAGE 8 OZ	1 1/2 C SOY SPAGHETTI SAUCE 1 EA NOODLES 1 C COOKED GREENS 2 EA BREAD 2 TSP MARGARINE 1 SERV CAKE 8 OZ BEVERAGE	1 C SOY RICE MIX 1 C COOKED EGG 1 C COOKED CARROTS 2 EA BREAD 2 TSP MARGARINE 1 SERV FRUIT 8 OZ BEVERAGE	1 1/2 C VEG PATTY 1 EA RICE 1 C GRAVY 2 EA COOKED CABBAGE 2 TSP BREAD 1 SERV MARGARINE 8 OZ BAKED APPLES BEVERAGE	1 EA PEANUT BUTTER 1 C JELLY 1/4 C CELERY 1 C CARROTS 2 EA BREAD 2 TSP FRUIT 1/2 C BEVERAGE 8 OZ	1 1/2 C BEANS 1 1/2 OZ NOODLES 1 C COOKED GREENS 1 C BREAD 4 EA MARGARINE 1 SERV FRUIT 8 OZ BEVERAGE

FOOD SERVICE DIRECTORS MAY MAKE SUBSTITUTIONS WHEN NECESSARY IN ACCORDANCE WITH FOOD SERVICE MANUAL GUIDELINES. PORTION SIZES ARE AS WRITTEN ON THE MENU. FRESH PRODUCE WILL BE SUBSTITUTED SEASONALLY LUNCH & DINNER MEAT ALTERNATE ENTREES: 1 1/2 CUPS BEANS OR VEG PATTY SALT & PEPPER PROVIDED AT ALL MEALS SWEETENER PROVIDED AT BREAKFAST

Signed copy on file
NATARCHA GREGG, MSA, RD

Enclosure

A

Virginia Department of Corrections
COMMON FARE MENU APRIL 2015 - MARCH 2016

WEEK 2

	SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
B JUICE	4 OZ COOKED APPLES	1/2 C JUICE	1 SERV JUICE	4 OZ FRUIT	1 SERV JUICE	4 OZ FRUIT	1 SERV JUICE
R COOKED FARINA	1 C COOKED OATMEAL	1 C COOKED FARINA	1 C COOKED OATMEAL	1 C COOKED OATMEAL	1 C COOKED FARINA	1 C COOKED OATMEAL	1 C COOKED FARINA
E COOKED EGG	2 EA PEANUT BUTTER	1/4 C FRENCH TOAST	2 EA SYRUP	2 EA FRIED EGG	2 EA PANCAKE	2 EA COOKED EGGS	2 EA BRK POTATOES
A BREAD	2 EA TOAST	2 EA SYRUP	2 EA SYRUP	2 OZ TOAST	2 EA SYRUP	2 OZ BREAD	2 EA BREAD
K JELLY	1 OZ JELLY	1 OZ BRK POTATOES	1 OZ BRK POTATOES	1/2 C JELLY	1 OZ BRK POTATOES	1/2 C JELLY	1 OZ JELLY
F MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE
A COFFEE	8 OZ COFFEE	8 OZ COFFEE	8 OZ COFFEE	8 OZ COFFEE	8 OZ COFFEE	8 OZ COFFEE	8 OZ COFFEE
S MILK	16 OZ MILK	16 OZ MILK	16 OZ MILK	16 OZ MILK	16 OZ MILK	16 OZ MILK	16 OZ MILK
T							
L SOY RICE MIX	1 1/2 C VEG PATTY	1 EA BEANS	1 1/2 C VEG PATTY	1 EA EGG SALAD	2/3 C PEANUT BUTTER	1/3 C SOY RICE MIX	1 1/2 C
U COOKED EGG	1 EA BOILED POTATOES	1 C COOKED GREENS	1 C RICE	1 C CARROTS	1 C JELLY	1 1/2 OZ COOKED EGG	1 EA
N COOKED GREENS	1 C COOKED CARROTS	1 C BAKED SWEET POT	1 EA STEWED TOMATOES	1 C CABBAGE	1 C CELERY	1 C COOKED CABBAGE	1 C
C BREAD	2 EA BREAD	2 EA BREAD	2 EA BREAD	2 EA BREAD	2 EA CUCUMBERS	1 C BREAD	2 EA
H MARGARINE	2 TSP KETCHUP	1 OZ MARGARINE	2 TSP KETCHUP	1 OZ FRUIT	1 SERV BREAD	4 EA MARGARINE	2 TSP
F FRUIT	1 SERV MARGARINE	2 TSP FRUIT	1 SERV MARGARINE	2 TSP MUSTARD	1 OZ FRUIT	1 SERV BAKED APPLES	1/2 C
BEVERAGE	8 OZ FRUIT	1 SERV BEVERAGE	8 OZ CAKE	1 SERV BEVERAGE	8 OZ BEVERAGE	8 OZ BEVERAGE	8 OZ
D TUNA CAKE	1 EA SOY SPAGHETTI SAUCE	1 C PEANUT BUTTER	1/3 C TUNA CAKE	1 EA VEG PATTY	1 EA TUNA CAKE	1 EA BEANS	1 1/2 C
I RICE	1 C NOODLES	1 C JELLY	1 1/2 OZ BEANS	1 C BEANS	1 C BOILED POTATOES	1 C COOKED GREENS	1 C
N GRAVY	1/4 C COOKED CABBAGE	1 C CELERY	1 C COOKED GREENS	1 C COOKED CABBAGE	1 C STEWED TOMATOES	1 C RICE	1 C
N COOKED SQUASH	1 C BREAD	2 EA CARROTS	1 C BREAD	2 EA BREAD	2 EA BREAD	2 EA BREAD	2 EA
E BREAD	2 EA MARGARINE	2 TSP BREAD	4 EA MARGARINE	2 TSP KETCHUP	1 OZ MARGARINE	2 TSP MARGARINE	2 TSP
R FRUIT	1 SERV CAKE	1 SERV FRUIT	1 SERV FRUIT	1 SERV MARGARINE	2 TSP CAKE	1 SERV FRUIT	1 SERV
MARGARINE	2 TSP BEVERAGE	8 OZ BEVERAGE	8 OZ BEVERAGE	8 OZ BEVERAGE	1 SERV BEVERAGE	8 OZ BEVERAGE	8 OZ
BEVERAGE	8 OZ						

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Signed copy on file

NATARCHA GREGG, MSA, RD

Virginia Department of Corrections
COMMON FARE MENU APRIL 2015 - MARCH 2016

WEEK 3

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
B R E A D F R U I T M I L K	1 SERV JUICE 1 C COOKED FARINA 2 EA PEANUT BUTTER 1/2 C TOAST 2 EA JELLY 2 TSP MARGARINE 1 OZ COFFEE 8 OZ MILK 16 OZ	4 OZ FRUIT 1 C COOKED OATMEAL 1/4 C PANCAKE 2 EA SYRUP 1 OZ BRK POTATOES 2 TSP MARGARINE 8 OZ COFFEE 16 OZ MILK	1 SERV JUICE 1 C COOKED FARINA 2 EA FRIED EGG 2 OZ TOAST 1/2 C JELLY 2 TSP MARGARINE 8 OZ COFFEE 16 OZ MILK	4 OZ FRUIT 1 C COOKED OATMEAL 2 EA FRENCH TOAST 2 EA SYRUP 1 OZ BRK POTATOES 2 TSP MARGARINE 8 OZ COFFEE 16 OZ MILK	1 SERV JUICE 1 C COOKED FARINA 2 EA COOKED EGG 2 OZ BREAD 1/2 C JELLY 2 TSP MARGARINE 8 OZ COFFEE 16 OZ MILK	4 OZ COOKED APPLES 1 C COOKED OATMEAL 2 EA SOY B-FAST PATTY 2 EA TOAST 1 OZ MARGARINE 2 TSP JELLY 8 OZ COFFEE 16 OZ MILK
L U N C H M E N U	1 EA EGG SALAD 1 C CUCUMBERS 1 C CARROT 2 EA BREAD 1 OZ MUSTARD 2 TSP FRUIT 1 SERV BEVERAGE 8 OZ	2/3 C TUNA CAKE 1 C BEANS 1 C COOKED SQUASH 2 EA BREAD 1 OZ MAYONNAISE 1 SERV MARGARINE 8 OZ BAKED APPLES BEVERAGE	1 EA PEANUT BUTTER 1 C JELLY 1 C CELERY 2 EA CARROTS 1 OZ BREAD 2 TSP FRUIT 1/2 C BEVERAGE 8 OZ	1/3 C BEANS 1 1/2 OZ COOKED GREENS 1 C BAKED SWEET POT 1 C BREAD 4 EA MARGARINE 1 SERV FRUIT 8 OZ BEVERAGE	1 1/2 C HARD BOILED EGGS 1 C NOODLES 1 EA COOKED CABBAGE 2 EA BREAD 2 TSP MAYONNAISE 1 SERV MARGARINE 8 OZ RICE PUDDING BEVERAGE	3 EA VEG PATTY 1 C BEANS 1 C STEWED TOMATOES 2 EA BREAD 1 OZ KETCHUP 2 TSP MARGARINE 1/2 C FRUIT 8 OZ BEVERAGE
D I N N E R	1 EA SOY RICE MIX 1 C COOKED EGG 1 C COOKED CABBAGE 2 EA BREAD 2 TSP MARGARINE 1 SERV CAKE 8 OZ BEVERAGE	1 1/2 C SOY SPAGHETTI SAUCE 1 EA NOODLES 1 C COOKED GREENS 2 EA BREAD 2 TSP FRUIT 1 SERV MARGARINE 8 OZ BEVERAGE	1 C SOY RICE MIX 1 C COOKED EGG 1 C COOKED CARROTS 2 EA BREAD 1 SERV MARGARINE 2 TSP FRUIT 8 OZ BEVERAGE	1 1/2 C VEG PATTY 1 EA BEANS 1 C COOKED CABBAGE 2 EA BREAD 2 TSP KETCHUP 1 SERV CAKE 8 OZ BEVERAGE	1 EA PEANUT BUTTER 1 C JELLY 1 C CELERY 2 EA CARROTS 1 OZ BREAD 1 SERV FRUIT 8 OZ BEVERAGE	1 1/2 C BEANS 1 1/2 OZ RICE 1 C CABBAGE 1 C BREAD 4 EA MARGARINE 1 SERV FRUIT 8 OZ BEVERAGE

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Virginia Department of Corrections
COMMON FARE MENU APRIL 2015 - MARCH 2016

WEEK 4

	SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
B JUICE	4 OZ COOKED APPLES	1/2 C JUICE	1 SERV JUICE	4 OZ FRUIT	1 C COOKED FARINA	4 OZ FRUIT	1 SERV JUICE
K COOKED FARINA	1 C COOKED OATMEAL	1 C COOKED FARINA	1 C COOKED OATMEAL	1 C COOKED OATMEAL	1 C COOKED FARINA	1 C COOKED OATMEAL	1 C COOKED FARINA
E COOKED EGG	2 EA PEANUT BUTTER	2 OZ FRENCH TOAST	2 EA FRIED EGG	2 EA PANCAKE	2 EA SYRUP	2 EA COOKED EGGS	2 EA BRK POTATOES
A BRK POTATOES	1/2 C TOAST	2 EA SYRUP	2 OZ TOAST	2 EA SYRUP	2 OZ SYRUP	2 OZ BREAD	2 EA BREAD
K BREAD	2 EAC JELLY	1 OZ BRK POTATOES	1/2 C JELLY	1 OZ BRK POTATOES	1 OZ BRK POTATOES	1/2 C JELLY	1 OZ JELLY
F JELLY	1 OZ MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE	2 TSP MARGARINE
A COFFEE	8 OZ COFFEE	8 OZ COFFEE	8 OZ COFFEE	8 OZ COFFEE	8 OZ COFFEE	8 OZ COFFEE	8 OZ COFFEE
S MILK	16 OZ MILK	16 OZ MILK	16 OZ MILK	16 OZ MILK	16 OZ MILK	16 OZ MILK	16 OZ MILK
T							
L SOY RICE MIX	1 1/2 C VEG PATTY	1 EA BEANS	1 1/2 C VEG PATTY	1 EA EGG SALAD	2/3 C PEANUT BUTTER	1/3 C SOY RICE MIX	1 1/2 C
U COOKED EGG	1 EA NOODLES	1 C COOKED GREENS	1 C RICE	1 C CARROTS	1 C JELLY	1 1/2 OZ COOKED EGG	1 EA
N COOKED GREENS	1 C COOKED CARROTS	1 C NOODLES	1 C STEWED TOMATOES	1 C CABBAGE	1 C CELERY	1 C COOKED CABBAGE	1 C
C BREAD	2 EA BREAD	2 EA BREAD	2 EA BREAD	2 EA BREAD	2 EA CUCUMBERS	1 C BREAD	2 EA
H MARGARINE	2 TSP KETCHUP	1 OZ MARGARINE	2 TSP GRAVY	1/4 C MUSTARD	1 OZ BREAD	4 EA MARGARINE	2 TSP
FRUIT	1 SERV MARGARINE	2 TSP FRUIT	1 SERV MARGARINE	2 TSP FRUIT	1 SERV FRUIT	1 SERV CAKE	1 SERV
BEVERAGE	8 OZ CAKE	1 SERV BEVERAGE	8 OZ FRUIT	1 SERV BEVERAGE	8 OZ BEVERAGE	8 OZ BEVERAGE	8 OZ
D TUNA CAKE	1 EA NOODLES	1 C PEANUT BUTTER	1/3 C TUNA CAKE	1 EA SOY SPAGHETTI SAUCE	1 C TUNA CAKE	1 EA BEANS	1 1/2 C
I NOODLES	1 C TOMATO SAUCE	1/2 C JELLY	1 1/2 OZ BEANS	1 C NOODLES	1 C BOILED POTATOES	1 C COOKED SQUASH	1 C
N COOKED SQUASH	1 C HARD BOILED EGG	3 EA CELERY	1 C COOKED GREENS	1 C COOKED CABBAGE	1 C STEWED TOMATOES	1 C RICE	1 C
N BREAD	2 EA COOKED CABBAGE	1 C CARROTS	1 C BREAD	2 EA BREAD	2 EA BREAD	2 EA MARGARINE	2 TSP
E FRUIT	1 SERV BREAD	2 EA BREAD	4 EA MAYONNAISE	1 OZ FRUIT	1 SERV MARGARINE	2 TSP FRUIT	1 SERV
R MAYONNAISE	1 OZ MARGARINE	2 TSP FRUIT	1 SERV BAKED APPLES	1/2 C BEVERAGE	8 OZ CAKE	1 SERV BEVERAGE	8 OZ
MARGARINE	2 TSP FRUIT	1 SERV BEVERAGE	8 OZ BEVERAGE	8 OZ	BEVERAGE	8 OZ	
BEVERAGE	8 OZ BEVERAGE	8 OZ					

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